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## Russian Federation

**Post:** Moscow

### Draft EAEU Recommended Rules of Food Sampling

**Report Categories:**

Sanitary/Phytosanitary/Food Safety

FAIRS Subject Report

**Approved By:**

Rachel Vanderberg

**Prepared By:**

Staff

**Report Highlights:**

The Eurasian Economic Commission (EEC), the regulatory body of the Armenia-Belarus-Kazakhstan-Kyrgyzstan-Russia Eurasian Economic Union (EAEU), published for comments a draft recommendation on the use of Common Rules of Sampling for Testing Food Products when Applying and Fulfilling the Requirements of the EAEU Technical Regulations (TRs). In particular, the draft contains rules of food sampling and requirements for storage and transportation of samples. The Common Rules may be used in case a relevant standard for sampling is missing in the list of standards established for a particular TR. The EEC's comment period for the draft started on June 26, 2017, and will close on July 16, 2017.

As of the date of publication of this report, FAS/Moscow does not believe this measure has been notified to the World Trade Organization.

## **General Information**

The Eurasian Economic Commission (EEC), the regulatory body of the Armenia-Belarus-Kazakhstan-Kyrgyzstan-Russia [Eurasian Economic Union](#) (EAEU), published the following draft recommendation for public comments on its website:

- [Draft Recommendation on the use of Common Rules of Sampling \(Taking Specimens\) for Examination \(Testing\) of Food Products when Applying and Fulfilling the Requirements of Technical Regulations of the Eurasian Economic Union](#)

In particular, the draft contains rules of food sampling and requirements for storage and transportation of samples. The Common Rules may be used in case a relevant standard for sampling is missing in the list of standards established for a particular TR.

An unofficial English translation of the above-referenced draft document can be found below.

The EEC's comment period for the draft started on June 26, 2017, and will close on July 16, 2017.

As of the date of publication of this report, FAS/Moscow does not believe this measure has been notified to the World Trade Organization.

BEGIN UNOFFICIAL TRANSLATION:

**EURASIAN ECONOMIC COMMISSION**

**COLLEGIUM**

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**RECOMMENDATION**

Dated \_\_\_\_\_ 20\_\_\_\_ No.\_\_\_\_ in the city of \_\_\_\_\_

**On the Common Rules of Sampling (Taking Specimens) for Examination (Testing) of Food Products when Applying and Fulfilling the Requirements of Technical Regulations of the Eurasian Economic Union**

The Collegium of the Eurasian Economic Union, in accordance with Article 51 of the Treaty on the Eurasian Economic Union of May 29, 2014, in order to implement the principles of technical regulation

recommends that as of January 1, 2018, the Eurasian Economic Union Member States follow the attached methodological guidelines when sampling (taking specimens) for examination (testing) of food products in the course of application and fulfillment of the requirements of the technical regulations of the Eurasian Economic Union.

Chairman of the Collegium  
Of the Eurasian Economic Union      T. Sargsyan

ATTACHMENT  
to Recommendation of the Collegium of the  
Eurasian Economic Commission  
No. \_\_\_\_\_ of \_\_\_\_\_ 2017

**METHODOLOGICAL GUIDELINES**  
**on the Common Rules of Sampling (Taking Specimens) for Examination (Testing) of Food**  
**Products when Applying and Fulfilling the Requirements of Technical Regulations of the**  
**Eurasian Economic Union**

1. General provisions

1.1. Guidelines on the common rules of sampling (taking specimens) for examination (testing) of food products when applying and fulfilling the requirements of Technical Regulations of the Eurasian Economic Union (hereinafter – the Guidelines, products, technical regulation, and the Union, respectively) have been developed in compliance with the principles of technical regulation within the Union, as regards the uniformity of rules and procedures for mandatory assessment of conformity; the uniformity of rules and techniques of examination (testing) and measurements in executing procedures of the mandatory assessment of conformity, exercise of the state control (surveillance) over compliance with the requirements of technical regulations of the Union based on the harmonization of legislation of the Union member states established in the Treaty on the Eurasian Economic Union of May 29, 2014 (hereinafter – the Treaty).

1.2. These Guidelines establish general rules of sampling (taking specimens) with respect to the content and sequence of performing procedures of product sampling (specimen taking); the Guidelines also include general requirements for the conditions of storage and transportation of product samples (specimens) collected for examination (testing).

2. Terms and definitions.

These Guidelines use definitions established by the Treaty, international agreements and acts composing the Union law, as well as the following terms and definitions:

selected sample – a collection of product units selected from a product consignment;

lot – a definite amount of products manufactured or produced under conditions, which are presumed uniform

composite sample – the combined total of identical incremental samples taken for the homogenous products which is intended for obtaining an average sample;

specimen – a unit of specific products or their portion, or a sample used as representative of these products for performing examination (testing);

sampling (specimen taking) procedure – a procedure used to draw samples (specimens) that comprise material for performing examination (testing);

consignment – a collection of identified quantity of units of some products with the same name and designation submitted by the applicant for performing examination (testing);

sample (representative sample) – an identified quantity of bulk products drawn from them and used as representative of these products for performing examination (testing) that enables to receive information on a given characteristic;

average sample – a portion of composite sample intended for performing examinations.

### 3. General provisions

3.1. The results of product examination (testing) depend, to a certain extent, on the completeness and adequacy of sampling (specimen taking) process. To achieve reliable results of examination (testing), all steps of the sampling process should be taken into consideration, and the documented operating procedures should be used as guidance during this process.

3.2. Rules of taking specimens (sampling) are established in the documents included in the list of international and regional (intergovernmental) standards and in case where such standards are unavailable – national (state) standards containing the rules and methods of examination (testing) and measurements, e.g. the sampling rules that are necessary for the application and fulfillment of the technical regulation requirements and the assessment of conformity of the items subject to technical regulation (hereinafter – the list of standards).

3.3. In case of unavailability of standards or documents establishing the rules of sampling (taking specimens) of products that belong to the items subject to technical regulation, the present Guidelines can be used.

3.4. As a rule, in the process of specimen taking (sampling), the following issues are addressed:

- uniformity of consignment;
- whether the selected sample is representative in terms of composition;
- whether the selected sample is representative in terms of quantity;
- conformity of specimens (samples) to the product identification attributes specified in the shipping documents.

3.5. Collected specimens (samples) by composition and manufacturing technology should be identical to those of the products intended for sales to the buyer (consumer).

3.6. For collecting specimens (samples) from a consignment of products, e.g. those held in shipping containers or cargo spaces of transport vehicles, it is necessary to take into consideration potential non-uniformity of the submitted consignment.

3.7. By composition of specimens (samples), a selected sample should reflect an entire collection of homogenous products subject to control by technical regulations, taking into account the differences in composition of individual types of such collection.

#### 4. Sampling (specimen taking) procedure

4.1. Sampling (specimen taking) should be performed by competent experts educated appropriately and trained in the rules and techniques of sample (specimen) collection. Experts who collect specimens (samples) should be provided with protective clothing and special equipment (tools) to be used for obtaining specimens (samples).

4.2. A random sampling plan is developed when product samples (specimens) are collected. To develop random sampling plan, the following issues shall be taken into consideration:

- the empirical (punctual) sampling (specimen taking) process enables a better characterization of the quality and homogeneity of selected products;
- in a composite sample the information on sample-to-sample variation of estimated parameters is lost due to the combination of primary samples.

4.3. For different types of tests (chemical, microbiological, physical, sensory analysis, etc.), the process of product sampling (specimen taking) should be representative in terms of quantity required for every type of the examination (testing).

4.4. Prior to product sampling (specimen taking), the appearance of collected samples (specimens) is inspected visually. Depending on their appearance, the product samples (specimens) are divided into:

- normal (no nonconformities caused by physical or chemical factors, or by the development of microorganisms were found during the visual inspection);
- suspicious (one or more nonconformities were found during the visual inspection that could occur either due to physical exposure or microbial contamination, or due to chemical and biochemical reactions in the products);
- defective (obvious defects of packaged units and/or product were found during the visual inspection (bloat, breather, fermentation, mold growth, rotting, slime development, souring, etc.).

Selection of suspicious or defective products for examination (testing) is not allowed.

4.5. While performing a product sampling (specimen taking) procedure, it is required:

- to ensure documentary (based on shipping and other documents) and visual (based on visual inspection of a lot, consignment) evidences that the collected samples (specimens) are representative for the consignment or lot; and in case where a consignment consists of several lots the samples (specimens) should be composed in such a way that they are representative for each individual lot;
- to determine the amount (size, weight, volume) and quantity of collected punctual samples (individual increments) for preparing composite samples from a controlled lot or consignment;
- to carry out sample data collection, processing and recording procedures followed by their encoding.

## 5. Requirements for sample (specimen) packaging and transportation

5.1. Product samples (specimens) should be packaged (stored) in such a manner that the examined (measured) indicators are not modified.

5.2. Where product samples (specimens) are collected with the aim of determining microbial contamination, for the processes of sampling and sample (specimen) packaging, disposable sterile packages (containers) and reusable sterile devices offering adequate protection from external contamination and protection against damage in transit and storage should be used. The package (container) with sample (specimen) should then be sealed in such a manner that unauthorized opening is easily detectable (placed in a safe pack, sealed and taped up). Where product samples (specimens) are collected for chemical analysis, dry clean packages (glassware) not affecting the results of product examination (testing) should be used. For sensory analysis, the packages (glassware) that do not modify taste, color or odor should be used. Packaging material that contacts the product sample should be water- and grease-resistant, insoluble and nonabsorbent.

5.3. Product samples (specimens) are placed in dry clean and, where necessary, sterile glassware (packages), sealed and marked.

5.4. A label should be packed together with the product sample (specimen).

5.5. Collected laboratory and reference product samples (specimens) are encoded in such a manner that experts of the testing laboratory (center) cannot determine the origin (owner, manufacturer) of products.

5.6. Product samples (specimens) should be transported under conditions ensuring the preservation of state, composition and quality of the product samples (specimens) as well as the environmental safety with the use of transport vehicle equipped for such purposes. Product samples (specimens) for which particular storage and transportation conditions are envisaged by the manufacturer should be delivered to the testing laboratory (center) in refrigerators or insulated containers at a preset temperature profile, not later than the expiry dates specified on the package or in the shipping documentation for a particular sample (specimen) (for perishable products – within the range from 4 to 72 hours depending on their name, unless other time intervals are established by the manufacturer).

6. Procedure of issuing an act of product sampling (specimen taking); time of their delivery to the testing laboratory (center).

6.1. Experts who perform sampling (specimen taking) will issue an act of product sampling (specimen taking). One copy of the act is kept by the officer (organization) who performed product sampling (specimen taking) and the other – by the product owner or his/her representative. If necessary, additional copies of the act of product sampling (specimen taking) may be issued.

6.2. The act of product sampling (specimen taking) (number and date of its issuance), types of product samples (specimens) are recorded in the registration logs of product sampling (specimen taking).

6.3. The maximum period for keeping product samples (specimens) in the testing laboratory (center) is established in its in-house documents and depends on the technical capabilities of the testing laboratory (center) as well as the time period envisaged for potential submission of a complaint on the results of completed examination (testing) of the product samples (specimens).

6.4. An expert who performed sampling procedure shall make arrangements for the delivery of product samples (specimens) to the testing laboratory (center). To impose the delivery of product samples (specimens) to the testing laboratory (center) on the product manufacturer (owner) or his/her designee is not allowed.

6.5. Time and manner of the delivery of product samples (specimens) to the testing laboratory (center) are established depending on the product type and should be estimated in such a way that the shelf lives are not longer than those specified on the package or in the shipping documents on a particular product sample (specimen). Product samples (specimens) that require special storage conditions (at low temperatures) are placed in cooler bags or covered by dry ice. Examination (testing) should be performed as soon as possible after the delivery and preparation of product samples (specimens).

END UNOFFICIAL TRANSLATION.